

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

MARTEN GROUP, INC. d/b/a
SENERGY MEDICAL GROUP and
SCOTT TENNANT,

Plaintiffs,

v.

JERALD TENNANT, MD, JOHN
TENNANT, TERESA JESSEN
TENNANT, JARED TENNANT,
TENNANT DEVICES AND
ACCESSORIES, LLC, and
CURADOR,
LLC,
Defendants.

Case No. 3:24-cv-01852

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENTRY OF AGREED
CONFIDENTIALITY AND PROTECTIVE ORDER**

TO THE HONORABLE JUDGE ADA BROWN:

Plaintiffs and Defendants (collectively “the Parties”) file this Joint Motion for Entry of Agreed Protective Order on the following basis:

1. The Parties believe that discovery in this matter will likely result in the production of documents and information that either one or both Parties in good faith deem confidential, proprietary, or trade secret.

2. The Parties have conferred and have agreed, as indicated by counsels' signatures below, to an Agreed Protective Order filed contemporaneously with this Motion.

3. The Parties have conferred and have agreed that the Agreed Protective Order sufficiently protects the Parties' respective interests in the confidential materials produced. Further, the Parties believe the proposed order will aid and not hinder the advancement of this matter.

4. The Parties used the Court's model order, with minor adjustments based on the particular facts of this case.

Therefore, pursuant to F.R.C.P. 26(c) and L.R. 7.1, the Parties request the Court enter Agreed Protective Order.

Dated: December 2, 2024

Respectfully submitted,

/s/Tyler L. Farmer

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that the parties have complied with the meet and confer requirements of Local Rule CV-7(h) and that the foregoing motion and relief sought therein is unopposed.

By: /s/Tyler L. Farmer
Tyler L. Farmer

CERTIFICATE OF WORD COUNT

Pursuant to Section II.A. of the Court's Procedures for Cases Assigned to District Judge Ada Brown and Standing Order, the undersigned hereby certifies that, per the word-processor register, the foregoing Motion contains 161 words, excluding the case caption, signature block, and certificates.

By: /s/Tyler L. Farmer
Tyler L. Farmer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through CM/ECF on December 2, 2024.

By: /s/Tyler L. Farmer
Tyler L. Farmer